

AO 91 (Rev. 02/09) Criminal Complaint

United States Magistrate Court

DSQ-SDTX

FILED

UNITED STATES DISTRICT COURT

SEP 15 2014 2B

for the

Southern District of Texas

David J. Bradley, Clerk
Laredo Division

United States of America)

v.)

Marissa Martinez)

Case No.

5:14mj1188

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 09/13/2014 in the county of WEBB in the SOUTHERN District ofTEXAS, the defendant violated Title 21 U. S. C. § 841(a)(1) & 952

, an offense described as follows:

knowingly, willfully and unlawfully import from a place outside the United States, to wit; the Republic of Mexico to a place in the United States, to wit; Laredo, Texas, a controlled substance listed under Schedule II, Title II, of the Controlled Substance Act, to wit; approximately twenty four point four two (24.42) kilograms, gross weight, of cocaine. Furthermore, the defendant did knowingly and unlawfully possess with intent to distribute the above listed cocaine.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

☒ Continued on the attached sheet.


Complainant's signature

Special Agent Bruce Donnet

Printed name and title

Sworn to before me and signed in my presence.

Date:

9/15/14



Judge's signature

City and state:

Laredo, Texas

Diana Song Quiroga, U.S. Magistrate

Printed name and title

Attachment "A"

I, Bruce Donnet, a Special Agent with Homeland Security Investigations, have knowledge of the following facts:

1. On September 13, 2014, Marissa MARTINEZ, a U.S. citizen, attempted entry into the United States via the Laredo International Bridge #1 Port of Entry in Laredo, TX. MARTINEZ was operating a 2002 Chevrolet pickup truck.
2. CBP officers referred MARTINEZ' vehicle for secondary inspection where a CBP canine officer received a positive alert from his narcotics canine in the front truck bed area of the vehicle.
3. CBP officers then conducted a non-intrusive x-ray inspection of the vehicle, which revealed an anomaly in the front wall of the truck bed.
4. CBP officers inspected the area further and discovered twenty two (22) bundles wrapped in black tape within the front wall of the truck bed.
5. CBP officers probed the bundles and extracted a white, powdery substance that field tested positive for having the properties consistent with cocaine. The total weight of the seized narcotics was twenty four point four two (24.42) kilograms.
6. Homeland Security Investigations (HSI) special agents advised MARTINEZ of her Miranda Rights in the English Language, to which MARTINEZ verbally, and in writing, agreed to waive and answer questions.
7. MARTINEZ admitted to knowingly transporting the drugs for financial gain.
8. HSI Special Agents arrested MARTINEZ for violations of Title 21 United States Code 841 and 952 and transported her to the Webb County Jail in Laredo, Texas.